

March 7, 2002

VIA ELECTRONIC SUBMISSION

William F. Caton, Acting Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: ***Ex Parte* Presentation -- CC Docket No. 94-102**
Revision of the Commission's Rules to Ensure Compatibility with
Enhanced 911 Emergency Calling Systems –
Section 20.18(c) TTY/Digital Compatibility
Qwest Wireless, LLC

Dear Mr. Caton:

Pursuant to Section 1.2106 of the Commission's rules, Qwest Wireless, LLC ("Qwest"), by its attorneys, hereby notifies the Commission of an oral *ex parte* presentation today with staff from the Wireless Telecommunications Bureau ("WTB") and the Consumer Information Bureau ("CIB"). WTB staff in attendance were: Blaise Scinto, Deputy Chief, Policy Division; Mindy Littell, Attorney Advisor, Policy Division; and Patrick Forster, Engineer, Policy Division. CIB staff in attendance were: Genero Fullano, Legal Advisor, Office of the Bureau Chief; Janet Sievert, Legal Advisor, Disabilities Rights Office; and Jenifer Simpson, Telecommunications Accessibility Specialist, Disabilities Rights Office. In attendance for Qwest was Melissa Newman, Vice President, Federal Regulatory. Also in attendance were Kathryn A. Zachem and Robert G. Morse of Wilkinson Barker Knauer, LLP, counsel for Qwest.

The attendees discussed matters relating to Qwest's compliance efforts with respect to the June 30, 2002 deadline for digital-TTY compatibility. 47 C.F.R. § 20.18(c), note. Attendees discussed the facts and issues raised in the attached document, which largely reiterates points made in Qwest's February 22, 2002 letter and Supplemental Fourth Quarter TTY Status Report, filed in the above-referenced proceeding.

WILKINSON) BARKER) KNAUER) LLP

William F. Caton, Acting Secretary

March 7, 2002

Page 2

The instant notification is being submitted electronically. Please contact us at (202) 783-4141 if you have questions or need additional information.

Sincerely,

Robert G. Morse/s/

Kathryn A. Zachem

Robert G. Morse

Attachment

Qwest Wireless, LLC and TW Wireless, LLC
Section 20.18(c) Digital-TTY Compatibility
March 7, 2002

- ***Extent of Ericsson Equipment in Network.*** Qwest Wireless utilizes two network architecture types, depending on the market involved: Lucent; and “Open-A”. The Open-A architecture utilizes equipment and software from multiple vendors (*e.g.* Nortel switch, Ericsson base stations, and Alcatel HLR)
 - Lucent network software is utilized in 81% of Qwest Wireless markets. Deployment of digital-TTY compatibility in Lucent markets is entirely on schedule.
 - For the Open-A markets (the remaining 19%) TTY-digital compatible software for Ericsson base station and base station controllers is required.
 - Qwest Wireless and Leap Wireless are the sole customers for Ericsson’s CDMA base station software.
 - Leap’s CDMA network utilizes primarily Ericsson equipment and software, whereas Qwest Wireless utilizes multiple vendors.
 - Ericsson’s time of delivery to Qwest Wireless is very uncertain.
- ***Status of Ericsson Software.*** The anticipated general availability (“GA”) release date for Ericsson software has been extended a number of times.
 - October 10, 2001 – Ericsson notified FCC that “[s]ystem verification test release software will be released to carriers” in January 2002.¹
 - Ericsson subsequently notified Qwest Wireless that the general availability (“GA”) date for TTY compliant software was extended to February 15, 2002 (as reported in November 21, 2001 supplement to Qwest Wireless quarterly report and its January 15, 2002 report).
 - January 30, 2002 -- Ericsson notified Qwest Wireless that GA date extended to May 28, 2002.
 - February 7, 2002 – Ericsson informed Qwest Wireless that Leap Wireless, not Qwest Wireless, would receive first office application software in March (as reported in February 22, 2002 supplement to Qwest Wireless quarterly report). Qwest Wireless had hoped to obtain FOA software in advance of the May 28, 2002 GA date, thus possibly expediting network-wide deployment.
 - Discussions with Ericsson are ongoing, but it remains very possible that the GA date will slip further.

¹ Ericsson’s October 10, 2001 report stated that release would occur “January, 2001.” Qwest Wireless has assumed that this was a typographical error.

- ***Steps Necessary for Full Deployment In Network.*** Once the Ericsson software becomes available to Qwest Wireless, additional steps will be necessary to provide reliable digital-TTY compatibility. These additional steps will take 3-5 months beyond the GA date (approx. 2-4 months beyond the June 30, 2002 deadline).
 - Test software in a laboratory environment
 - Based on past experience, Qwest Wireless believes that a “patch” will be developed to ensure that Ericsson’s software works in the Open-A architecture.
 - Software load.
 - Live network tests with selected TTY-capable PSAPs.
 - Network-wide deployment/activation of digital-TTY capability.
- ***Waiver***
 - Qwest will be unable to meet the June 30, 2002 deadline for its Open-A markets due to unavailability of Ericsson software.
 - The waiver would be limited to markets with the Open-A architecture.
 - As of today, the necessary duration for a waiver request is uncertain due to the potential for further slippage of the GA date.